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8 **UNITED STATES DISTRICT COURT**
CENTRAL DISTRICT OF CALIFORNIA
EASTERN DIVISION

9

10 OMAR BOLANOS, individually, and
11 on behalf of all others similarly situated,

12 Plaintiff,

vs.

13 CROSSROADS EQUIPMENT LEASE
14 & FINANCE, LLC,

15 Defendant.

Case No. 5:24-cv-00552-JGB-SP

**PLAINTIFF'S NOTICE OF
MOTION AND JOINT MOTION
TO CONSOLIDATE**

Date: April 22, 2024

Time: 9:00 a.m. PST

Judge: Jesus G. Bernal

Courtroom: 1, Riverside

16 CAREN LUKE, individually, and on
17 behalf of all others similarly situated,

18 Plaintiff,

vs.

20 CROSSROADS EQUIPMENT LEASE
21 & FINANCE, LLC,

22 Defendant.

Case No. 5:24-cv-00634

NOTICE OF MOTION AND MOTION

Please take notice that on **April 22, 2024**, at **9:00 a.m. PST**, Plaintiffs Omar Bolanos and Caren Luke and Defendant Crossroads Equipment Lease & Finance, LLC will and hereby do move the Court to enter an Order consolidating these two related actions, staying Defendant's deadline to respond to the complaints in the *Luke* and *Bolanos* cases pending the resolution of this Joint Motion to Consolidate, and granting Plaintiffs twenty-one (21) days from the Court's approval of the Joint Motion to Consolidate to file a consolidated complaint. In support of this Motion, the Parties submit herewith a Memorandum of Points and Authorities.

CERTIFICATION OF COUNSEL

Pursuant to Local Rule 7-3, counsel for Plaintiff certifies that they conferred with counsel for Defendant via email on April 9 and 10, 2024.

Date: April 15, 2024

Date: April 15, 2024

Respectfully Submitted,

Respectfully Submitted,

/s/ Andrew Gunem

/s/ John S. Purcell

Raina C. Borrelli *

John S. Purcell

Andrew Gunem

Franjo M. Dolenac

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Counsel for Plaintiff Bolanos

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10 *Counsel for Plaintiff Luke*

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on April 15, 2024, I electronically filed the foregoing
3 with the Clerk of Court using the ECF system, which will send notification of such
4 filing and effectuate service to all counsel of record in this matter.

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6 */s/ Andrew Gunem*
7 Andrew Gunem
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